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INTERVENTION**BEFORE THE ARIZONA CORPORATION COMMISSION**

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COMMISSIONERS

Arizona Corporation Commission

2014 APR 14 A 10:39

BOB STUMP, Chairman**DOCKETED****GARY PIERCE**

APR 14 2014

CORP COMMISSION
DOCKET CONTROL**BRENDA BURNS****BOB BURNS****SUSAN BITTER SMITH**

DOCKETED BY

ORIGINAL

IN THE MATTER OF THE
APPLICATION OF JOHNSON
UTILITIES, LLC, DOING BUSINESS AS
JOHNSON UTILITIES COMPANY, FOR
APPROVAL OF SALE AND TRANSFER
OF ASSETS AND CONDITIONAL
CANCELLATION OF ITS
CERTIFICATE OF CONVENIENCE
AND NECESSITY.

DOCKET NO. WS-02987A-13-0477

MOTION TO INTERVENE

Pursuant to A.A.C. R14-3-105, San Tan Heights Homeowners Association ("San Tan HOA") hereby moves to intervene and participate as a party in the above-captioned proceeding.

I. DESCRIPTION OF SAN TAN HEIGHTS HOMEOWNERS ASSOCIATION

San Tan Heights is a master planned community currently comprising over 3,200 residents. The San Tan Heights master planned community is governed by the San Tan HOA. The San Tan HOA's common areas include community parks and substantial greenbelt areas. The San HOA also manages and maintains two lakes. San Tan HOA and its residents receive all of their potable and non-potable water utility service, and wastewater utility service from Johnson Utilities.

II. INTEREST IN PROCEEDING

San Tan HOA has a direct and substantial interest in these proceedings. San Tan HOA and its residents are among Johnson Utilities largest customers for potable and non-potable

1 water service and wastewater service. No other party to these proceedings can adequately
2 represent San Tan HOA. The terms and conditions of the transfer of Johnson Utilities' assets
3 to the Town of Florence, and the continued, uninterrupted water and sewer service to the San
4 Tan HOA and its current and future residents is of vital importance to the San Tan HOA.

5
6 **III. SERVICE**

7 The name, mailing address, telephone number, fax number and email address of the
8 person upon whom service of documents is to be made is:

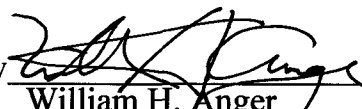
9 William H. Anger
10 Engelman Berger, P.C.
11 3636 N. Central Ave., Suite 700
12 Phoenix, AZ 85012
13 (602) 271-9090
14 (602) 222-4999-fax
15 wha@eblawyers.com
16 Attorneys for San Tan Heights Homeowners Association

17
18 **IV. REQUESTED RELIEF**

19 San Tan HOA asks the Commission to grant its Motion to Intervene and to be allowed
20 to participate as a party of record in these proceedings.

21 **RESPECTFULLY SUBMITTED** this 14th day of April, 2014.

22 **ENGELMAN BERGER, P.C.**

23 By 
24 William H. Anger
25 3636 North Central Avenue, Suite 700
26 Phoenix, Arizona 85012
27 Attorneys for San Tan Heights Homeowners Association

1 **ORIGINAL** and 13 copies filed on
2 April 14, 2014 with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington
6 Phoenix, AZ 85007

7 **COPY** of the mailed this 14th day of April,
8 2014 to:

9 Teena Jibilian
10 Administrative Law Judge
11 Arizona Corporation Commission
12 1200 W. Washington St.
13 Phoenix, Arizona 85007

14 Janice Alwar, Chief Counsel
15 Robin Mitchell
16 Legal Division
17 Arizona Corporation Commission
18 1200 West Washington
19 Phoenix, Arizona 85007

20 Steve Olea, Director
21 Utilities Division
22 Arizona Corporation Commission
23 1200 West Washington
24 Phoenix, Arizona 85007

25 Jeffrey W. Crockett
26 Brownstein Hyatt Farber Schreck
27 One East Washington Street
Suite 2400
Phoenix, AZ 85004
Attorneys for Johnson Utilities, LLC

James Mannato, Town Attorney
Town of Florence
P.O. Box 2670
Florence, Arizona 85132

Daniel Pozefsky
Chief Counsel
Residential Utility Consumer Office
1110 West Washington St., Suite 220
Phoenix, Arizona 85007

Craig A. Marks
Craig A. Marks, PLC
10645 N. Tatum Blvd. Ave.
Suite 200-676
Phoenix, AZ 85028
Attorneys for Swing First Golf, LLC

Michele Van Quathem
Ryley Carlock & Applewhite
One North Central Avenue, Suite 1200
Phoenix, Arizona 85004-4417

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24
25
26
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